

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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| UNITED STATES OF AMERICA | : | CRIMINAL NO. 07- |
| v. | : | DATE FILED: February 8, 2007 |
| ANDRE T. CEPHAS, | : | VIOLATIONS: |
| a/k/a "Husayn," | : | 18 U.S.C. § 371 (conspiracy - 1 count) |
| SCOTTIE J. WILLIAMS | : | 18 U.S.C. § 1542 (making false statement |
| JOSETTE J.M. WILSON | : | in United States passport application - |
| JUAN G. RUTLEDGE, | : | 5 counts) |
| a/k/a "Bucky" | : | 18 U.S.C. § 1028A(a) (aggravated identity |
| | | theft - 5 counts) |

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From at least in or about June 2005 and continuing through at least in or about December 2006, in the Eastern District of Pennsylvania and elsewhere, defendants

ANDRE T. CEPHAS,
a/k/a "Husayn,"
SCOTTIE J. WILLIAMS,
JOSETTE J.M. WILSON,
and
JUAN G. RUTLEDGE,
a/k/a "Bucky,"

conspired and agreed with each other, Person No. 1, a person known to the grand jury, and others known and unknown to the grand jury to: (a) wilfully and knowingly make false statements in applications for United States passports, with intent to induce and secure for the use of themselves and others, the issuance of passports under the authority of the United States, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws; and (b) knowingly transfer, possess, and use without lawful authority the means of identification

of another person without lawful authority during the commission of a felony offense, that is, making false statements in applications for United States passports, in violation of Title 18, United States Code, Sections 1028A(a) and 1542.

MANNER AND MEANS

2. It was part of the conspiracy that Person No. 1 was in the business of, among other things, obtaining fraudulent United States passports using the identifying information of people he recruited in the Philadelphia area and the photographs of others.

It was further part of the conspiracy that:

3. Person No. 1 recruited others to apply for United States passports with their identifying information but using the photographs of other people.

4. Person No. 1 agreed to pay the people he recruited to make passport applications approximately \$1,000 to \$1,500 per fraudulent United States passport they obtained.

5. Person No. 1 recruited defendant ANDRE T. CEPHAS to obtain fraudulent United States passports containing the photographs of others which Person No. 1 intended to sell. Person No. 1 agreed to pay defendant CEPHAS between \$1,000 and \$1,500 per fraudulent United States passport he was responsible for obtaining.

6. At the direction of Person No. 1, defendant ANDRE T. CEPHAS recruited defendants SCOTTIE J. WILLIAMS, JOSETTE J.M. WILSON, and JUAN G. RUTLEDGE, a/k/a "Bucky," to obtain fraudulent United States passports with the photographs of others for Person No. 1 which Person No. 1 intended to sell. Person No. 1 agreed to pay defendants WILLIAMS, WILSON, and RUTLEDGE between \$1,000 and \$1,500 for each fraudulent United States passport they were able to obtain.

OVERT ACTS

_____ In furtherance of the conspiracy, Person No. 1, defendants ANDRE T. CEPHAS, SCOTTIE J. WILLIAMS, JOSETTE J.M. WILSON, and JUAN G. RUTLEDGE, and others known and unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

_____ 1. On or about June 20, 2005, at the direction of Person No.1, defendant ANDRE T. CEPHAS applied for and obtained a fraudulent United States passport using his identifying information and another person's photograph.

2. On or about January 9, 2006, at the direction of Person No. 1, defendant JOSETTE J.M. WILSON applied for and obtained a fraudulent United States passport using her identifying information and another person's photograph.

3. On or about February 24, 2006, at the direction of Person No.1, defendant ANDRE T. CEPHAS applied for and obtained a fraudulent United States passport using his identifying information and another person's photograph, claiming that his first passport had been lost.

4. On or about May 23, 2006, at the direction of Person No. 1, defendant ANDRE T. CEPHAS recruited defendants SCOTTIE J. WILLIAMS and JUAN G. RUTLEDGE to obtain fraudulent United States passports for Person No. 1 using the identifying information of defendants WILLIAMS and RUTLEDGE and the photographs of other people.

5. On or about May 23, 2006, Person No. 1 offered defendants SCOTTIE J. WILLIAMS and JUAN G. RUTLEDGE approximately \$1,000 in cash for each fraudulent United States passport they were able to obtain.

6. On or about May 23, 2006, Person No. 1 possessed several passport-size photographs of individuals which he intended to supply to defendants SCOTTIE J. WILLIAMS and JUAN G. RUTLEDGE to use to obtain fraudulent United States passports.

7. On or about May 23, 2006, Person No. 1 selected passport-size photographs of individuals from the ones he possessed and provided one each to defendants SCOTTIE J. WILLIAMS and JUAN G. RUTLEDGE for them to use in obtaining fraudulent United States passports.

8. On or about May 23, 2006, defendants SCOTTIE J. WILLIAMS and JUAN G. RUTLEDGE applied for fraudulent United States passports, using their own identifying information and the photographs of other people that they had been given by Person No. 1.

9. Between on or about May 23, 2006 and in or about November 2006, Person No. 1 contacted defendants SCOTTIE J. WILLIAMS and JUAN G. RUTLEDGE to check on the status of their obtaining the fraudulent passports.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 20, 2005, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**ANDRE T. CEPHAS,
a/k/a “Husayn,”**

knowingly and without lawful authority transferred, possessed, and used, and aided and abetted
the transfer, possession, and use, of a means of identification of another person, that is, a
photograph of another person, during and in relation to a fraudulent application for a United
States passport, in violation of Title 18, United States Code, Section 1542.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(7), and
2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 9, 2006, in Philadelphia, in the Eastern District of
Pennsylvania, defendants

**ANDRE T. CEPHAS,
a/k/a “Husayn,”
and
JOSETTE J.M. WILSON**

knowingly and without lawful authority transferred, possessed, and used, and aided and abetted
the transfer, possession, and use, of a means of identification of another person, that is, a
photograph of another person, during and in relation to a fraudulent application for a United
States passport, in violation of Title 18, United States Code, Section 1542.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(7), and

2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 24, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**ANDRE T. CEPHAS,
a/k/a “Husayn,”**

knowingly and without lawful authority transferred, possessed, and used, and aided and abetted the transfer, possession, and use, of a means of identification of another person, that is, a photograph of another person, during and in relation to a fraudulent application for a United States passport, in violation of Title 18, United States Code, Section 1542.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(7), and

2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 23, 2006, in Philadelphia, in the Eastern District of
Pennsylvania, defendants

**ANDRE T. CEPHAS,
a/k/a Husayn,”
and
SCOTTIE J. WILLIAMS**

knowingly and without lawful authority transferred, possessed, and used a means of
identification of another person, and aided and abetted the transfer, possession, and use, of a
means of identification of another person, that is, a photograph of another person, during and in
relation to a felony, that is obtaining a fraudulent United States passport, in violation of Title 18,
United States Code, Section 1542.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(7), and
2.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 23, 2006, in Philadelphia, in the Eastern District of
Pennsylvania, defendants

**ANDRE T. CEPHAS,
a/k/a “Husayn,”
and
JUAN G. RUTLEDGE,
a/k/a “Bucky,”**

knowingly and without lawful authority transferred, possessed, and used, and aided and abetted
the transfer, possession, and use, of a means of identification of another person, that is, a
photograph of another person, during and in relation to a felony, that is obtaining a fraudulent
United States passport, in violation of Title 18, United States Code, Section 1542.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(7), and
2.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 20, 2005, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**ANDRE T. CEPHAS,
a/k/a “Husayn,”**

knowingly and willfully made, and aided and abetted the making of, false statements in an application for a United States passport, with intent to induce and secure for the use of himself and others, the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws, that is, defendant CEPHAS provided with his application a photograph of another person, not defendant CEPHAS, and falsely represented that he was the person in the photograph, when, in fact, he knew that the photograph was of another person.

In violation of Title 18, United States Code, Sections 1542 and 2.

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 9, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**ANDRE T. CEPHAS,
a/k/a “Husayn”
and
JOSETTE J.M. WILSON**

knowingly and willfully made, and aided and abetted the making of, false statements in an application for a United States passport, with intent to induce and secure for the use of themselves and others, the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws, that is, defendant WILSON provided with her application a photograph of another person, not defendant WILSON, and falsely represented that she was the person in the photograph, when, in fact, she and defendant CEPHAS knew that the photograph was of another person.

In violation of Title 18, United States Code, Sections 1542 and 2.

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 26, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**ANDRE T. CEPHAS,
a/k/a “Husayn,”**

knowingly and willfully made, and aided and abetted the making of, false statements in an application for a United States passport, with intent to induce and secure for the use of himself and others, the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws, that is, defendant CEPHAS provided with his application a photograph of another person, not defendant CEPHAS, and falsely represented that he was the person in the photograph, when, in fact, he knew that the photograph was of another person.

In violation of Title 18, United States Code, Sections 1542 and 2.

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 23, 2006, in Philadelphia, in the Eastern District of
Pennsylvania, defendants

**ANDRE T. CEPHAS,
a/k/a “Husayn,”
and
SCOTTIE J. WILLIAMS**

knowingly and willfully made, and aided and abetted the making of, false statements in an application for a United States passport, with intent to induce and secure for the use of himself and others, the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws, that is, defendant WILLIAMS provided with his application a photograph of another person, not defendant WILLIAMS, and falsely represented that he was the person in the photograph, when, in fact, he and defendant CEPHAS knew that the photograph was of another person.

In violation of Title 18, United States Code, Sections 1542 and 2.

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 23, 2006, in Philadelphia, in the Eastern District of
Pennsylvania, defendants

**ANDRE T. CEPHAS,
a/k/a “Husayn,”
and
JUAN G. RUTLEDGE,
a/k/a “Bucky,”**

knowingly and willfully made, and aided and abetted the making of, false statements in an application for a United States passport, with intent to induce and secure for the use of themselves and others, the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws, that is, defendant RUTLEDGE provided with his application, a photograph of another person, not defendant RUTLEDGE, and falsely represented that he was the person in the photograph, when, in fact, he and defendant CEPHAS knew that the photograph was of another person.

In violation of Title 18, United States Code, Sections 1542 and 2.

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
United States Attorney